Exhibit A
PARTIES' PROPOSED CLAIM CONSTRUCTIONS

Parties' Proposed Claim Constructions

	Claim Term, Phrase, or Clause and Patent(s) and Claim(s) in which it appears	Constr. Requested By	Soverain's Proposed Construction	Defendants' Proposed Construction(s)
	U.S. Patent Nos. 5,715,314 and 5,909,492			
1.	Shopping cart computer '314 patent: claims 34, 35, 39, 49, 74, 84, 109, 134, 144 '492 patent: claims 17, 18, 35, 36	defendants	Soverain and Newegg adopt the *Amazon* Markman Order construction "a computer processing data associated with one or more shopping carts" subject to Newegg's right of appeal	
				Systemax & TigerDirect a computer processing data associated with one or more shopping carts but is not operated by an operator of a merchant computer
2.	Shopping cart message '314 patent: claims 34, 39, 84, 144 '492 patent: claims 17, 18, 35, 36	defendants	The parties adopt the *Amazon* Markman Order construction "a message concerning a shopping cart" subject to the defendants' right of appeal	

1

	Claim Term, Phrase, or Clause and Patent(s) and Claim(s) in which it appears	Constr. Requested By	Soverain's Proposed Construction	Defendants' Proposed Construction(s)
	U.S. Patent Nos. 5,715,314 and 5,909,492			
3.	Payment message '314 patent: claims 34, 35, 39, 49, 74, 109, 134 '492 patent: claim 17, 18, 35, 36	defendants	a message relating to a payment for one or more products	a message relating to a payment for one or more products, containing an authenticated user's payment information and sent to the buyer computer
4.	To cause said payment message to be activated to initiate a payment transaction '314 patent: claims 34, 39 '492 patent: claim 17, 18, 35, 36	defendants	to cause an action associated with said payment message to initiate a payment transaction *See* term 3	upon request of the authenticated user, the buyer computer causes the submission of said payment message

2

	U.S. Patent Nos. 5,715,314 and 5,909,492			
	Claim Term, Phrase, or Clause and Patent(s) and Claim(s) in which it appears	Constr. Requested By	Soverain's Proposed Construction	Defendants' Proposed Construction(s)
5.	A Shopping Cart URL '314 patent: claims 60, 65, 120, 125	defendants	a URL concerning a shopping cart	a standard HTTP request message send by the buyer computer to the shopping cart computer which causes the shopping cart computer to modify content of a shopping cart and includes URL with a product identifier, a domain identifier, a payment amount, a merchant computer identifier, a merchant account identifier, a duration time, an expiration time, and a shopping cart URL authenticator
6.	Hypertext link '492 patent: claim 15, 16	defendants	a non-sequential web association which the user can use to navigate through related topics	text in a document that forms a navigational element pointing, for example, to another document, or form, or resource
7.	A statement URL '492 patent: claim 41, 76	defendants	a URL concerning a statement	a standard HTTP request message with URL to the Statement Document including its path on the server on which it resides

3

	Claim Term, Phrase, or Clause and Patent(s) and Claim(s) in which it app	Constr. Requested By	Soverain's Proposed Construction	Defendants' Proposed Construction(s)
			U.S. Patent No. 7,272,639	
8.	Service request '639 patent: claims 1, 10, 60, 65, 78, 79	defendants	The parties adopt the Amazon Markman Order construction "a solicitation of services from a client to a server. A service request may entail the exchange of any number of messages between the client and the server." subject to the defendants' right of appeal	
9.	Session identifier '639 patent: claims 1, 10, 47, 63, 78, 79	defendants	The parties adopt the *Amazon* Markman Order construction "a text string that identifies a session" subject to the defendants' right of appeal	
10.	Session '639 patent: claims 1, 10, 47, 63, 78, 79	defendants	The parties adopt the Amazon Markman Order construction "a series of requests and responses to perform a complete task or set of tasks between a client and a server system" subject to the defendants' right of appeal	

4

	U.S. Patent No. 7,272,639			
	Claim Term, Phrase, or Clause and Patent(s) and Claim(s) in which it app	Constr. Requested By	Soverain's Proposed Construction	Defendants' Proposed Construction(s)
11.	the stored session identifier '639 patent: claim 1	defendants	Plain meaning applies; this term does not require construction *See* terms 9, 10	a session identifier that is recorded in computer storage without other information, excluding standard browser formats common to the Web on or before June 7, 1995.
12.	subsequent distinct requests '639 patent: claims 1, 79	defendants	Plain meaning applies; this term does not require construction *See* term 8	every request for a separate and different service
13.	Validating, at the server system, the appended session identifier / validating the session identifier appended to the service request '639 patent: claims 47, 78	defendants	at the server system, determining the validity of the appended session identifier / determining the validity of the session identifier appended to the service request *See* term 9	checking that the session identifier is valid without resort to information stored elsewhere, such as in the server system

5

	U.S. Patent No. 7,272,639			
	Claim Term, Phrase, or Clause and Patent(s) and Claim(s) in which it app	Constr. Requested By	Soverain's Proposed Construction	Defendants' Proposed Construction(s)
14.	A purchase request / a request for purchase '639 patent: claim 60	defendants	One or more messages requesting a purchase	a service request including a user identifier in which a buyer initiates a payment transaction for product(s) the buyer wishes to purchase
15.	Creating, responsive to the initial service request, the session identifier '639 patent: claim 79	defendants	producing, in response to the initial service request, the session identifier *See* terms 9, 17	creating, based on a type of the first request for service, the session identifier
16.	Hyperlink '639 patent: claim 62	defendants	a non-sequential web association which the user can use to navigate through related topics	a navigational element pointing, for example, to another document, or form, or resource
17.	Initial service request '639 patent: claims 10, 79	Soverain	the first service request in a session *See* terms 8, 10	the first request for service
18.	Controlled document '639 patent: claim 47	Soverain	a document that can be accessed when one or more conditions are met	a document for which authentication is required

6